

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

VINCENT CLARK ESPINOZA

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 113(a)(3),
117(a)(1), 1512(b)(3), and 1153

COUNT ONE

Domestic Assault by a Habitual Offender

The Grand Jury Charges:

In or about the month of February 2016, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

VINCENT CLARK ESPINOZA,

an Indian, did commit a domestic assault upon L.M., his girlfriend/intimate partner at the time, causing bodily injury, and at that time VINCENT CLARK ESPINOZA had a final conviction on at least two (2) separate prior occasions in federal, state, and tribal court proceedings for the following offenses that would be, if subject to federal jurisdiction, any assault, sexual, and serious violent felony against a spouse and intimate partner:

1. Simple Assault (Domestic Violence), Fort Berthold District Court, case number CR-2012-0094, date of conviction 2/17/12; and
2. Simple Assault (Domestic Violence) (2nd), Fort Berthold District Court, case number CR-2012-1222, date of conviction 12/21/12;

In violation of Title 18, United States Code, Section 117(a)(1).

COUNT TWO

Domestic Assault by a Habitual Offender

The Grand Jury Further Charges:

In or about the month of April 2016, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

VINCENT CLARK ESPINOZA,

an Indian, did commit a domestic assault upon L.M., his girlfriend/intimate partner at the time, causing bodily injury, and at that time VINCENT CLARK ESPINOZA had a final conviction on at least two (2) separate prior occasions in federal, state, and tribal court proceedings for the following offenses that would be, if subject to federal jurisdiction, any assault, sexual, and serious violent felony against a spouse and intimate partner:

1. Simple Assault (Domestic Violence), Fort Berthold District Court, case number CR-2012-0094, date of conviction 2/17/12; and
2. Simple Assault (Domestic Violence) (2nd) – Fort Berthold District Court, case number CR-2012-1222, date of conviction 12/21/12;

In violation of Title 18, United States Code, Section 117(a)(1).

COUNT THREE

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about August 26, 2019, in the District of North Dakota, in Indian country,
and within the exclusive jurisdiction of the United States,

VINCENT CLARK ESPINOZA,

an Indian, assaulted L.M., an Indian, with a dangerous weapon, namely shod feet, with
intent to do bodily harm;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1153.

COUNT FOUR

Tampering with a Witness

The Grand Jury Further Charges:

On or about December 3, 2019, in the District of North Dakota,

VINCENT CLARK ESPINOZA

did knowingly and willfully attempt to intimidate, threaten, and corruptly persuade L.M., with the intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to the commission of a federal offense, to wit: Assault with a Dangerous Weapon, in violation of Title 18, United States Code, Sections 113(a)(3) and 1153;

In violation of Title 18, United States Code, Section 1512(b)(3).

A TRUE BILL:

/s/ Foreperson _____
Foreperson

/s/ David D. Hagler, AUSA
DREW H. WRIGLEY
United States Attorney

EBL/tmg